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 **Delta Air Lines**

FAA-00-7952-40

Delta Air Lines, Inc.  
Post Office Box 20706  
Atlanta, Georgia 30320-6001  
November 14, 2000

U.S. Department of Transportation  
Docket Management System  
400 7<sup>th</sup> Street SW  
Plaza Level 401  
Washington, DC 20591

Re: Docket #FAA-2000-7952, Service Difficulty Reports, Final Rule  
65 FR 56191, September 15, 2000

Ladies and Gentlemen,

What follows are the comments of Delta Air Lines, Inc. with respect to the information collection requirements of the Service Difficulty Reports, Final Rule, Docket No. FAA-2000-7952. This rule intends to improve the reporting system to effectively collect and disseminate clear and concise safety information to the aviation industry.

This final rule contains information collection that is subject to review by the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995. While the current service difficulty reporting requirements were approved under OMB assigned control numbers 2120-0008, 2120-0085, 2120-0003, and 2120-0039, an opportunity for comment on the paperwork portion of this amended rule was not provided during the NPRM stage. To that end, the FAA is soliciting comments on four (4) aspects of its submission. Delta Air Lines' comments on those aspects follow.

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**Aspect (i):** "Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility."

**Comment:** Delta Air Lines does not believe that the collection of Service Difficulty Report information is necessary as, over time, it has proved to be an ineffective tool for addressing reliability trends. Historical occasions of significant aircraft discrepancies and related operational events have demonstrated that existing local reporting procedures, protocols, and relationships between air carriers and their governing Certificate Holding District Offices preside as the effective data collection tools-of-choice. Significant events that cause concern for safety automatically trigger tremendous and timely communication between air carriers, manufacturer representatives, and FAA Airworthiness and Certification personnel so that those concerns may be swiftly rectified. This Lead Airline Process, as it is commonly known, has become the cornerstone of industry cooperation in the mutual interest of safety. These efforts, combined

with the constructive involvement of the individual Principal Maintenance Inspectors in air carrier reliability program activities, provide the Certificate Holding District Offices with more palatable alternatives to the tedious and unyielding task of sifting through the voluminous and inconsistent SDR data in an attempt to recognize a significant trend. The subject Final Rule will serve solely to grow the SDR data base without enhancing its usefulness, thus making it even less likely that it will capture the attention of the industry or FAA. History has shown that Principal Maintenance Inspectors, having such intimate accessibility to information obtained from their respective carriers through oversight, protocols, and working relationships, are uniquely positioned to identify significant trends, and determine those that should be reported across the agency and the industry. By utilizing such positions, PMIs should maximize the effectiveness of existing FAA internal data bases to capture and distribute truly substantial data, while foregoing the costly collection of insignificant information, such as that which dominates the SDR data base.

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**Aspect (ii):** "Evaluate the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used."

**Comment:** Within the text of the final rule, the FAA has cited estimated report increases of three percent (3%) to forty-five percent (45%) with a corresponding increased annual cost per carrier of \$67. Delta has performed a detailed analysis of its anticipated increase of reporting burden with substantially different results. Delta conservatively estimates that its annual number of reports will increase from the current *industry leading* 3,250 to 108,997, or +3,300%. The corresponding annual cost of compliance with this data collection and reporting rule is estimated to be \$1,129,000 in addition to an implementation cost of \$1,130,000. Delta believes that the vast disparity in estimates is rooted in a number of assumption errors on the part of the agency when assessing the impact of the rule.

- The FAA states in the Analysis of Benefits that the increased reporting time from 72 to 96 hours should result in fewer supplemental reports being filed. Common industry practice for extended out-of-service aircraft, such as those undergoing corrosion visits or other heavy maintenance visits, has been to file SDRs within 72 hours from time of return-to-service. Elsewhere in the document, the FAA disputes such a practice by clearly stating that the reporting window begins at time-of-discovery. As most aircraft undergoing heavy maintenance are out-of-service for as many as 6 weeks or more, and since most of the reports applicable to the new 121.704 structural SDRs will apply to such aircraft, the number of reports requiring supplements will drastically increase.
- Similarly, the FAA anticipates that duplicate reporting will be reduced by permitting repair stations to submit reports on behalf of the carriers. However, in actual practice, since most aircraft worked by 145 repair stations are out-of-service longer than the 96-hour reporting window, and since the carrier remains ultimately responsible for the filing of reports under the new rule, duplicate reporting will continue.
- With respect to the structural provisions of the current rule, common practice has been only to report significant findings, particularly those requiring major repair. It is evident by the reporting estimates made by the agency that they assumed current reporting practices to be

closer in number to the reports anticipated by the new rule. Under the final rule, as written, particularly since the Primary Structural Element reporting qualification has been dropped since the original proposal, almost every structural non-routine task within C and D checks will be reportable. This will annually generate tens of thousands of reports going forward, with most of those, as discussed above, requiring supplements.

- Within the autoflight reporting provision of 121.703(a)(12), the agency has painted a broad scope which will require the reporting of every discrepancy associated with ATA chapters 22 (autoflight) and 34 (navigation). Delta anticipates these reports alone on an annual basis will exceed the current reporting total by 200-300%. Furthermore, Delta believes that this provision, as written, exceeds the original FAA intent as stated in the preambles to acquire data relevant to uncommanded maneuvers initiated by autoflight systems.

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**Aspect (iii): “Enhance the quality, utility, and clarity of the information collected.”**

Comment: In the original NPRM leading up to this rule, the stated intent of the agency was to collect data that would center around the issue of aging aircraft. Particular emphasis was placed on primary structure, as evidenced by qualifying language to that effect in the original draft of 121.704. Since that time, however, the PSE qualification has been removed from all but the composite provision of 121.704. This will cause the reporting of each structural non-routine task found by air carriers, including thousands of minor defects which are effectively controlled through existing maintenance programs. Combine those reports with the thousands that will be generated by other broad provisions, such as the autoflight reporting requirement, and it is easy to conclude that the SDR data base is poised to incur a flood of information, the majority of it insignificant. Not only will this glut of information mask or bury significant findings, but the data will be so diluted, that it will be rendered untrendable. Therefore, Delta believes that the SDR data base will become less usable, and will attract less attention from the industry or the FAA than it does today.

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**Aspect (iv): “Minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated electronic, mechanical or other forms of information technology, e.g., permitting electronic submission of responses.”**

Comment: Delta’s assessment of the impact of this final rule has identified major logistical hurdles in some of the data that will be required once the rule becomes effective. New data that is required by the rule is the manufacturer’s name for parts or components related to a reportable event. This data is not captured in the course of routine maintenance log entries, nor is it available through Delta’s data bases, requiring extensive research efforts. Additionally, most parts are not tracked for time in service, however, that information is required by the new rule. These requirements are mandated without regard to their availability, or relief for their unavailability. Burdens such as these will impact cost due to substantial manpower required to accomplish the research necessary to produce the data. Furthermore, Delta’s automation system which today provides electronic transfer to the FAA will require extensive programming to permit the reporting of the additional required data. Delta anticipates that electronic reporting

will have to be suspended for the first year under the new rule. Therefore, Delta will incur costs for the printing and shipping of tens of thousands of paper reports in addition to the automation enhancement costs during the initial 12 months.

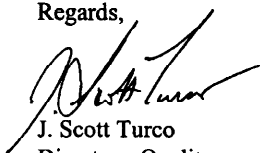
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Summary: In summary, Delta Air Lines fully supports initiatives which achieve maximum levels of safety across the industry with an appropriate burden level. However, more information is not necessarily better or more useful information. The provisions enacted by the Service Difficulty Report, Final Rule will impose significant cost burdens on the industry in order to build a data base of monumental proportion which will be populated with largely insignificant and unusable data. Occurrences necessitating industry action will be obscured by the unnecessary data such that the data base will be largely ignored by industry and FAA. It is in light of these observations and estimations that Delta Air Lines proposes the following actions.

1. Immediately withdraw the effective date applicable to Docket #FAA-2000-7952 Service Difficulty Reports, Final Rule until such time that industry concerns may be heard, understood, and considered.
2. Initiate an industry/FAA cooperative effort to design a Service Difficulty Report system which will provide a maximum safety benefit to the traveling public and capture the attention of all applicable parties as being an effective tool for identifying safety trends. Such a system should adequately target substantial maintenance discrepancies, significant operational events, and anticipated high-risk aircraft systems and structures, while clearly avoiding the capture of relatively routine and otherwise insignificant data which are effectively controlled through well-established and time-proven maintenance and reliability programs.

Delta Air Lines appreciates the opportunity to comment on the Service Difficulty Report Final Rule. Should any questions arise from these comments, please direct inquiries to Greg Carroll, Program Manager - FAA/NTSB Liaison at 404-714-5838, or by e-mail at [greg.carroll@delta.com](mailto:greg.carroll@delta.com).

Regards,



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Delta Air Lines, Inc.

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